



ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE, WASHINGTON 98101

SEP 20 1985

REPLY TO  
ATTN OF:

M/S 613

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Robert Eberle, Regional Administrator  
G.S.A. Federal Center South  
4735 East Marginal Way South  
Seattle, Washington 98134

Re: Toxic Substances Control Act  
Docket No. 1086-09-26-2615

Dear Mr. Eberle:

On February 20, 1986, an inspection of the General Services Administration (GSA) Federal Center South in Seattle, Washington, was performed by Daniel Tangarone and Annette Petrie of the United States Environmental Protection Agency (EPA) pursuant to Section 11 of the Toxic Substances Control Act (TSCA). This inspection was conducted to determine whether activities at the facility were in compliance with EPA regulations governing polychlorinated biphenyls (PCBs): 40 CFR Part 761.

Enclosed you will find a Complaint and Notice of Opportunity for Negotiation. The Complaint alleges that the GSA Federal Center South at Seattle, Washington, violated the recordkeeping and storage provisions of the PCB Regulations issued pursuant to the Toxic Substances Control Act. Accordingly, it is of considerable importance that you attend to this matter forthwith.

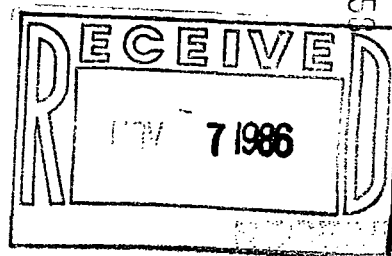
You should immediately take steps to satisfy the following, if you have not already done so:

1. Develop and maintain Annual Records at the Federal Center South facility.
2. Use containers which conform to DOT specifications when storing PCBs for disposal.
3. Place all PCB Items designated for disposal in a marked storage for disposal facility.

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You should be advised that, pursuant to Executive Order 12088, EPA will, if corrective measures are not promptly taken, refer these matters to Terrence Golden, GSA Administrator, for appropriate action or, if necessary, present the problem to the Office of Management and Budget for resolution. Criminal penalties are also authorized for knowing and willful violations of the law. Correcting the conditions noted in the attached complaint may protect you from Agency enforcement action for future violations. However, it will not prevent actions on those violations that have already occurred. Nothing in this letter should be construed to waive or limit any remedy available to EPA by virtue of conditions at your facility or the acts or omissions of your organization.

Please understand that the aforementioned steps are being recommended to avoid risk to health and the environment. The General Services Administration bears the ultimate responsibility for taking all steps necessary to comply with the law. If you have any questions regarding this letter, please contact Elizabeth Waddell of my staff. Ms. Waddell can be reached at EPA Region 10, 1200 Sixth Avenue, M/S 524, Seattle, Washington 98101, telephone (206) 442-4016. For your information, I have enclosed a copy of the document "Federal Facilities Compliance Program" which provides our framework for negotiations and other administrative actions which may be necessary.

Sincerely,



Anita J. Frankel, Chief  
Pesticides and Toxic Substances Branch

Enclosures

cc: Dan Tangarone  
John A. Foley, EPA Headquarters  
Regional Hearing Clerk  
Deborah E. Hilsman, Attorney  
Anita Frankel, Air and Toxics Division  
William Hedgebeth, Air and Toxics Division